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24
25 **IN THE UNITED STATES DISTRICT COURT**
26 **FOR THE NORTHERN DISTRICT OF ALABAMA**
27 **NORTHEASTERN DIVISION**
28

Hispanic Interest Coalition of Alabama, et al.,

Plaintiffs,

v.

Governor Robert Bentley, et al.,

Defendants.

Case No.: 5:11-cv-02484-SLB

BRIEF OF AMICUS CURIAE
ANTI-DEFAMATION LEAGUE
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION

Statement of Interest

The Anti-Defamation League (“ADL”) is the leading nongovernmental organization in the United States that trains law enforcement officers on issues of hate crimes and extremism. ADL provides training through a national network of regional offices to thousands of law enforcement officers to ensure that they know how to recognize and identify hate crimes and investigate them properly and sensitively. ADL has trained law enforcement leaders at its *Advanced Training School: Course on Extremist and Terrorist Threats* in Washington, D.C. With the United States Holocaust Memorial Museum, ADL has also trained more than 45,000 law enforcement professionals in *Law Enforcement and Society: Lessons of the Holocaust*, a program that examines how law enforcement became co-opted by the Nazi regime during the Holocaust, and that provides law enforcement professionals with an increased understanding of the importance of their relationship to the communities they serve and their role as protectors of civil rights guaranteed by the United States Constitution.

ADL also has unmatched expertise concerning the development of federal and state hate crimes legislation. In 1981, ADL drafted a model state hate crime law, and the District of Columbia and 45 states, including Alabama, have enacted statutes based on or similar to ADL’s model. ADL was a leading advocate for the Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009 (“HCPA”), 18 U.S.C. § 249. ADL also has advocated for laws mandating the collection of statistics about hate crimes.

Through its work with law enforcement and expertise in hate crime, ADL is uniquely situated to assist the Court in evaluating the public consequences of Alabama House Bill 56, as amended (“HB 56”), particularly in connection with the reporting and prevention of hate crimes. While the principal issue before the Court is preemption, and while ADL agrees with Plaintiff- Appellee’s argument on that issue, ADL submits this brief to address a specific area of public safety that will be harmed if the Preliminary Injunction is not granted. As shown below, unless the court issues a Preliminary Injunction, enjoining the enforcement of HB 56, this law will undermine the enforcement

1 of hate crimes laws in Alabama by driving a sharp wedge between law enforcement and
2 communities whom such laws were designed to protect.

3 Argument

4 Preliminary Statement

5 If well-ordered liberty means anything, it must mean that all persons should be
6 afforded access to police protection if they become victims of hate crimes. The Beason-
7 Hammon Alabama Taxpayer and Citizen Protection Act ("HB 56"), impedes that access
8 for *all* Latino and Hispanic Alabama residents whether United States citizens, lawful
9 residents or undocumented immigrants.¹ HB 56 poses a substantial threat of deterring
10 Latinos and Hispanics from reporting crimes or serving as witnesses in criminal
11 investigations. More directly than laws passed in other states, HB 56 targets victims of
12 crimes for deportation and reporting to Immigration Services, effectively eliminating
13 police protection for undocumented persons, or those who fear for their undocumented
14 family members or friends. This *amicus* brief provides additional context and
15 information about a particular and devastating consequence of the rupture in police-
16 community trust that HB 56 will inevitably cause – the creation of an underclass uniquely
17 vulnerable to increased hate crimes and violence.

18 As shown below, unless its enforcement is enjoined, HB 56 is substantially likely
19 to cause irreparable harm to the enforcement of Alabama and federal hate crimes statutes
20 by driving a wedge between law enforcement and Latino and Hispanic communities.
21 That breach in trust will render the State's Latino and Hispanic community uniquely
22 vulnerable to the commission of hate crimes – an outcome fundamentally at odds with the
23 strong public policies embodied in federal and state anti-hate crimes legislation. Granting

24 _____
25 ¹While this *amicus* brief focuses on the relationship between law enforcement and the
26 Latino and Hispanic communities, ADL understands and supports the position that there
27 are additional immigrant communities that will be similarly affected by HB 56, including
28 Alabama's Asian community.

1 the preliminary injunctive relief that Plaintiffs seek will avert irreparable harm that HB
 2 56 will otherwise inflict on the policing of hate crimes in Alabama, and will advance the
 3 vital public interest in ensuring that federal and Alabama anti-hate crimes statutes are
 4 enforced to the fullest extent of the law. *See Winter v. Natural Res. Def. Council, Inc.*,
 5 129 S. Ct. 365, 376 (2008).

6 Argument

7 **I. HB 56 Will Undermine the Latino and Hispanic Communities' Trust in Law** 8 **Enforcement Eviscerating the Police's Ability to Enforce Criminal Law,** 9 **Including Federal and State Hate Crime Laws.**

10 **A. Hate Crimes Targeting Latinos and Hispanics Are a Significant Issue** 11 **which HB 56 will Exacerbate by Further Obstructing Enforcement of** 12 **Federal and Alabama Prohibitions Against Hate Crimes Based on** 13 **National Origin and Color.**

14 Alabama's criminal statutes include strong prohibitions against the commission of
 15 hate crimes. Code of Ala. § 13A-5-13 imposes additional penalties "where it is shown
 16 that the perpetrator committing the underlying offense was motivated by the victim's
 17 actual or perceived race, color, religion, national origin, ethnicity, or physical or mental
 18 disability." The federal Hate Crimes Prevention Act of 2009, which gives the United
 19 States Department of Justice the power to investigate and prosecute violent crimes where
 20 the perpetrator selects the victim because, *inter alia*, of the person's actual or perceived
 21 race, color or national origin, evinces an equally strong federal policy against the
 22 commission of hate crimes. 18 U.S.C. § 249.²

23 The issue of hate crimes in our nation and specifically bias crimes targeting
 24 Latinos or Hispanics is far from theoretical. According to statistics gathered by the
 25 Federal Bureau of Investigation documenting hate crimes through 2008, hate crimes that

26 ² See <http://www.justice.gov/crt/crim/249fin.php> (last visited June 21, 2010) (discussing
 27 the HCPA and other federal anti-hate crimes statutes).
 28

1 year reached their highest level since 2001.³ In 2008, 7,783 hate crimes were reported
 2 nation-wide.⁴ Of those, 561 were motivated by the actual or perceived Hispanic ethnicity
 3 of the victim.⁵ In 2009, we saw a slight decrease in incidents of hate crimes reported,
 4 with 6,604 reported nationwide.⁶ Of those, 483 were motivated by the actual or perceived
 5 Hispanic identity of the victim.⁷ While this was a decline from the 2008 number, it
 6 represented an increase in the percentage of reported hate crimes motivated by perceived
 7 Hispanic heritage.⁸ In the past 10 years, between 400 and 600 hate crimes against
 8 Hispanics have been reported each year.⁹

9 While these figures are deeply disturbing, they do not reflect the full scope of hate
 10 crimes committed in the United States. Rather, they only represent hate crimes reported
 11 by local law enforcement agencies to the FBI, which is voluntary under the federal Hate
 12 Crimes Statistics Act ("HCSA").¹⁰ Indeed, a June 2011 federal Bureau of Justice
 13 Statistics ("BJS") report estimates that 148,400 hate crimes actually occurred in 2009 -
 87% of which involved bias-motivated violent acts.¹¹ Of these crimes, 17%, or

14 ³ See ADL table, "Ten Year Comparison of FBI Hate Crime Statistics (2008-1999),
 15 available at http://www.adl.org/combating_hate/HCSA_10year.asp (last visited June 21,
 2010).

16 ⁴ Uniform Crime Report, Hate Crime Statistics, 2008. U.S. Department of Justice Federal
 17 Bureau of Investigation, table 1, available at
http://www.fbi.gov/ucr/hc2008/data/table_01.html (last visited June 21, 2010).

18 ⁵ *Id.*

19 ⁶ Hate Crime Statistics: Incidents, Victims and Known Offenders by Bias Motivation,
 2009, Federal Bureau of Investigation,
http://www2.fbi.gov/ucr/hc2009/data/table_01.html (last visited June 10, 2011)

21 ⁷ *Id.*

22 ⁸ Hate Crime Statistics: Incidents, Victims and Known Offenders by Bias Motivation,
 2008, Federal Bureau of Investigation,
http://www2.fbi.gov/ucr/hc2008/data/table_01.html (last visited June 10, 2011)

23 ⁹ ADL table, "Ten Year Comparison of FBI Hate Crime Statistics (2008-1999), available
 at http://www.adl.org/combating_hate/HCSA_10year.asp (last visited June 21, 2010).

24 ¹⁰ Hate Crime Data Collection Guidelines, Uniform Crime Reporting; U.S. Department of
 Justice, Federal Bureau of Investigation (Revised October 1999) -
 25 <http://www.fbi.gov/about-us/cjis/ucr/hate-crime/hcguidelinesdc99.pdf>

26 ¹¹ Special Report: Hate Crime, 2003-2009, U.S. Department of Justice Bureau of Justice
 27 Statistics (June 2011), <http://www.bjs.gov/content/pub/pdf/hc0309.pdf>

1 approximately 25,200, targeted persons who identify as Latino or Hispanic.¹²
2 Furthermore, 64% of those crimes, approximately 16,100, were reported as being based
3 on the ethnicity of the victim.¹³

4 The BJS report reflects the significant gaps in systematic and comprehensive
5 national collection of hate crimes data.¹⁴ One of the causes of these gaps is victims
6 underreporting hate crimes to law enforcement.¹⁵ Victims fail to report for multiple
7 reasons, including immigrant communities' fear of deportation.¹⁶

8 Underreporting of hate crimes is a serious issue in Alabama. For example, in 2009
9 law enforcement only reported a total of nine hate crimes incidents to the FBI. Even for
10 HCSA purposes this number appears to be quite low as the comparably populated states
11 of Colorado and South Carolina reported 208 and 124 hate crimes incidents, respectively,
12 for the same year.¹⁷ Moreover, while in 2009 a total of 218 Alabama law enforcement
13 agencies participated in the HCSA program, a mere six agencies reported hate crimes
14 incidents to the FBI.¹⁸

15 The very purpose and protections of hate crimes laws are undermined when
16 victims fail to report. Undoubtedly, fear of immigration-violation detention or
17 deportation among Latino or Hispanic immigrants residing in Alabama already
18 undermines the enforcement of the Alabama and federal hate crimes laws. HB 56 will
19 only serve to exacerbate this problem. Its enactment will greatly increase this fear among
20 Alabama's Latino and Hispanic communities. Consequently, HB 56 will inevitably

21 ¹² Id.

22 ¹³ Id.

23 ¹⁴ See Hate Crimes in America: The Nature and Magnitude of the Problem, The
24 Leadership Conference [http://www.civilrights.org/publications/hatecrimes/nature-and-](http://www.civilrights.org/publications/hatecrimes/nature-and-magnitude.html)
25 [magnitude.html](http://www.civilrights.org/publications/hatecrimes/nature-and-magnitude.html) (Last Visited July 7, 2011).

26 ¹⁵ Id.

27 ¹⁶ Id.

28 ¹⁷ Hate Crime Statistics: Agency Hate Crime Reporting by State, 2009,
http://www2.fbi.gov/ucr/hc2009/data/table_12.html (Last Visited July 11, 2011)

¹⁸ Id.

1 further undermine enforcement of the federal and Alabama hate crimes laws by
 2 increasing the underreporting of bias crimes targeting Latinos or Hispanics.

3 **B. Police Cannot Enforce the Law If Victims and Witnesses Are Unwilling**
 4 **to Come Forward.**

5 The Police Foundation, the International Association of Chiefs of Police, and the
 6 Major Chiefs Association have all expressed grave concerns that deputizing local law
 7 enforcement officers to enforce immigration law undermines the trust and cooperation of
 8 immigrant communities.¹⁹ For example, a 2009 report by the Police Foundation states
 9 that “[i]mmigration enforcement by local police undermines their core public safety
 10 mission, diverts scarce resources, increases their exposure to liability and litigation, and
 11 exacerbates fear in communities already distrustful of police.”²⁰ According to Police
 12 Foundation President Hubert Williams:

13 Police executives have felt torn between a desire to be helpful
 14 and cooperative with federal immigration authorities and a
 15 concern that their participation in immigration enforcement
 16 efforts will undo the gains they have achieved through
 community-oriented policing practices directed at gaining the
 trust and cooperation of immigrant communities. As one
 police chief pointed out during the project, “How do you
 police a community that will not talk to you?”²¹

17 The Major Cities Chiefs Association agrees. According to its 2006 Position Statement:

18 Local agencies have worked very hard to build trust and a
 19 spirit of cooperation with immigrant groups through
 20 community based policing and outreach programs and
 21 specialized officers who work with immigrant groups. Local
 22 agencies have a clear need to foster trust and cooperation with
 23 everyone in these immigrant communities. Assistance and
 cooperation from immigrant communities is especially
 important when an immigrant, whether documented or
 undocumented, is the victim of or witness to a crime. These
 persons must be encouraged to file reports and come forward
 with information. Their cooperation is needed to prevent and

24 ¹⁹ See Arizona Association of Chiefs of Police Statement on Senate Bill 1070, available at
 25 http://www.leei.us/main/media/AACOP_STATEMENT_ON_SENATE_BILL_1070.pdf
 (last visited June 21, 2010).

26 ²⁰ <http://www.policefoundation.org/pdf/strikingRelease.pdf> (last visited June 21, 2010).

27 ²¹ Id.

1 solve crimes and maintain public order, safety, and security in
the whole community. . . .

2 Immigration enforcement by local police would likely
3 negatively effect and undermine the level of trust and
4 cooperation between local police and immigrant
5 communities. . . . Undoubtedly legal immigrants would avoid
6 contact with the police for fear that they themselves or
7 undocumented family members or friends may become
8 subject to immigration enforcement. **Without assurances**
9 **that contact with the police would not result in purely civil**
10 **immigration enforcement action, the hard won trust,**
communication and cooperation from the immigrant
community would disappear. Such a divide between the
local police and immigrant groups would result in
increased crime against immigrants and in the broader
community, create a class of silent victims and eliminate
the potential for assistance from immigrants in solving
crimes or preventing future terroristic acts.²² [emphasis
added]

11 Indeed, members of Alabama law enforcement similarly expressed
12 significant concerns about the potential detrimental impact of HB 56 on
13 Latinos and Hispanics reporting criminal activity. According to an April
2011 news report:

14 If the law passes the Senate as it is now written and is signed
15 into law, it also could have a chilling effect on a populace that
is already afraid of law enforcement, officials said.

16 **Northport Police Chief Robert W. Green said he suspects**
17 **the Hispanic community of Northport already reports far**
18 **fewer crimes than actually occur, out of fear of being**
deported.

19 **'I think ... (that) would probably increase significantly**
20 **with the passage of this bill,' Green said.**

21 [Tuscaloosa County Sheriff Ted] Sexton, [Tuscaloosa County
22 Sheriff Ted] Anderson and Green said the number of
23 Hispanic or Latino suspects whom they already encounter is
24 relatively low.

25 ²² Major Cities Chiefs Immigration Committee Recommendations, June 2006, available
26 at
27 http://www.majorcitieschiefs.org/pdfpublic/MCC_Position_Statement_REVISED_CEF_2009.pdf (emphasis added) (last visited June 21, 2010).

1 In fact, Sexton said it was too low, compared to arrests of
 2 other races, despite the growing number of Hispanic and
 3 Latin American residents that were reflected in the 2010
 4 Census. The recent census data counted 5,949 Hispanics in
 the county, nearly triple the 2,130 Hispanics counted 10 years
 prior.²³ [emphasis added]

5
 6 **C. HB 56 Will Prevent Police From Effectively Enforcing the Laws
 Prohibiting Hate Crimes**

7 Unless its enforcement is enjoined, HB 56 will create an underclass of people who
 8 have no meaningful access to police services out of fear that their perceived immigration
 9 status will subject them to heightened law enforcement scrutiny whenever they come into
 10 contact with police, or will result in their incarceration or deportation for reporting a crime
 11 whether as a victim or witness.

12 In its aim to deal with the issue of undocumented persons living in Alabama, HB
 13 56 grants local law enforcement officers the authority to investigate the immigration
 14 status of any person lawfully stopped based on "reasonable suspicion" that they may be
 15 in the country unlawfully. Furthermore, Section 13 of HB 56 provides greater
 16 justification for unauthorized stops by making it a crime to "conceal, harbor, transport,
 17 house, or induce or encourage entrance into the state by any alien person."²⁴

18 Indeed, the provisions of HB 56 not only remove assurances that contact with law
 19 enforcement will not result in civil immigration enforcement, they seem to guarantee it.
 20 The law will essentially deputize a sector of local law enforcement to act as immigration
 21 agents. Specifically, HB 56, in part, authorizes Alabama Homeland Security to designate
 22 a specialized sector of the police force to enforce the provisions of HB 56, to work with
 23
 24

25 ²³ See Jason Morton, *Top local law officials uneasy over proposed immigration law*,
 26 TuscaloosaNews.com (April 7, 2011),
<http://www.tuscaloosaneews.com/article/20110407/NEWS/110409726?p=2&tc=pg>

27 ²⁴ HB 56 Section 13
 28

1 national immigration officials in reporting and prosecuting violators of the law, and to
2 “promulgate rules for the enforcement of this act.”²⁵

3 Furthermore, HB 56 essentially provides no protection from immigration
4 enforcement for victims of or “critical witnesses” to hate-based or other crimes, or their
5 children. In relevant part HB 56 states:

6
7 “If a person is an alien who is unlawfully present in the
8 United States and is a victim of a criminal act, is the child of a
9 victim of a criminal act, is a critical witness in any
10 prosecution, or is the child of a critical witness in any
11 prosecution of a state or federal crime, all provisions of this
12 act shall be stayed until all of the related legal proceedings are
concluded. However, the relevant state, county, or local law
enforcement agency shall comply with any request by federal
immigration officers to take custody of the person.”²⁶

13 Thus, application of HB 56 is merely stayed pending final resolution of a
14 criminal complaint or complaint. Moreover, this stay provision does not
15 apply where federal immigration authorities seek to take a victim of crime,
16 a witness or their children into custody.

17 As a result of these provisions, Latinos and Hispanics – whether documented or
18 undocumented - likely will be deterred from reporting or serving as witnesses to criminal
19 activities in the community, including hate crimes. The most severe consequences of HB
20 56 will likely fall upon Latinos and Hispanics who are undocumented or have
21 undocumented family members. For all practical purposes, the law will preclude such
22 individuals from reporting hate crimes and other criminal activities to law enforcement.

23 ADL knows from long experience advocating for and training law enforcement on
24 the implementation of hate crime laws that close cooperation between local law
25 enforcement and minority communities is essential. If crime and immigration

26 ²⁵ HB 56 sections 22-24

27 ²⁶ HB 56 Section 21

1 enforcement become intertwined, police may find out-of-status persons and their family
 2 members hesitant to seek protection, to report crimes committed against them or to serve
 3 as witnesses in other crimes – compromising the police’s ability to keep the community
 4 safe. *See Part II.A, supra.*

5 Moreover, when a bias-motivated crime is committed, the victim’s entire
 6 community may be left feeling victimized, vulnerable, fearful, isolated and unprotected
 7 by the law. The impact of the crime spreads far beyond the already terrible consequences
 8 for the individual victim. Yet hate crimes will go unreported or underreported even more
 9 so than they currently are if HB 56 is permitted take effect, because victims and witnesses
 10 will hesitate to contact law enforcement if doing so will subject them heightened law
 11 enforcement scrutiny and possible detention, arrest or deportation. Rather than making
 12 protecting the Latino, Hispanic and other minority citizens of Alabama, the “Taxpayers
 13 and Citizens Protection Act” – as the bill’s sponsors titled the statute – will have exactly
 14 the opposite effect.

15 **II. Victims, Their Communities and the Public Will Be Irreparably Harmed by**
 16 **the Underreporting of Hate Crimes that Will Inevitably Result from HB 56,**
 17 **and the Public Interest Strongly Supports Enjoining the Statute’s**
 18 **Enforcement.**

19 ADL has monitored and exposed the increasingly hateful anti-immigrant, anti-
 20 Latino and anti-Hispanic rhetoric that has surrounded the national debate on immigration
 21 reform.²⁷ HB 56 was passed against this backdrop of anger and frustration in Alabama.
 22 Indeed, the sponsor of HB 56, Representative Micky Hammon, explained the bill came
 23 from the report produced by the Joint Interim Patriotic Immigration Commission, which
 24 was created by the Alabama legislature to address the “unprecedented influx of non-
 25 English speaking immigrants.”²⁸ The sponsor of the Senate version of the bill, Senator

26 ²⁷ ADL Report: “Immigrants Targeted: Extremist Rhetoric Moves into the Mainstream,”
 27 available at http://www.adl.org/civil_rights/anti_immigrant/ (last visited June 21, 2010).

28 SPLC Complaint.

1 Scott Beason, has reportedly said such statements as, “The reality is that if you allow
2 illegal immigration to continue in your area you will destroy yourself eventually.”²⁹


3 In this climate, it is critically important that law enforcement be fully able to police the
4 laws against the commission of hate crimes directed at the Latino community. Yet, as
5 discussed above, HB 56 effectively requires local law enforcement to investigate the
6 immigration status of persons with whom they come into contact if “reasonable
7 suspicion” exists – setting up an inherent conflict that threatens to result in the loss of
8 access to police protection for hundreds of thousands of persons in Alabama. Many legal
9 residents have relatives or friends who are undocumented, or fear that they will be subject
10 to “reasonable suspicion” merely because they “look” or “sound” like “illegal aliens.” By
11 putting police and large segments of the community potentially at odds with one another,
12 HB 56 is likely to create a large population that lacks access to the type of basic police
13 services that the rest of the community takes for granted. This lack of protection –
14 combined with the atmosphere of hateful rhetoric that has marked much of the
15 immigration debate – will create a law enforcement underclass that is vulnerable to the
16 commission of bias-motivated violence and crime. Such a result risks institutionalizing
17 precisely the kinds of harms that the anti-hate crimes laws were designed to prevent. It is
18 contrary to the strong public policies against hate crime embodied in federal and
19 Alabama law, and is inimical to the public’s interest in advancing public safety and
20 security.

21 Conclusion

22 For the foregoing reasons, HB 56 will inflict irreparable harm if its enforcement is
23 not enjoined, and the public interest strongly supports entry of a preliminary injunction.

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25
26 ²⁹ <http://www.cullmantimes.com/local/x2072622472/Beason-Dems-don-t-want-to-solve-illegal-immigration-problem>.
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2 RESPECTFULLY SUBMITTED this 5th day of August, 2011.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON August 5, 2011, I caused the attached document To be electronically transmitted to the Clerk's Office using the CM/ECF System for Filing and transmittal of a Notice of Electronic Filing to each of the CM/ECF Registrants in the subject case matter.

This 5th day of August, 2011.



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